

EXHIBIT "1"

ZENSTEIN KOVALSKY BUCKALEW, LLC

By: JOSEPH A. ZENSTEIN, ESQUIRE

Identification No.: 62349

Two Logan Square

100 N. 18th Street, Suite 300

Philadelphia, PA 19103

izenstein@zensteinlaw.com

(215) 230-0800

MAJOR CASE

NON-JURY

*Filed and Attested by the
Office of Judicial Records
22 JAN 2020 09:54 am
A. SILIGRINI*



Attorney for Plaintiffs

ANGLERS PRO SHOP, INC.
3361 Bethlehem Pike
Souderton, PA 18964
AND
JOANNE NOTARANGELO
3361 Bethlehem Pike
Souderton, PA 18964

v.

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA
One Tower Square
Hartford, CT 06183

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

DOCKET NUMBER:

PRAECIPE TO ISSUE WRIT OF SUMMONS

TO THE PROTHONOTARY:

Kindly issue a Writ of Summons against Defendant in the above-captioned matter.

ZENSTEIN KOVALSKY BUCKALEW, LLC

BY:

JOSEPH A. ZENSTEIN, ESQUIRE
Attorney for Plaintiffs

Date: January 22, 2020

SUMMONS
CITACION

Commonwealth of Pennsylvania
CITY AND COUNTY OF PHILADELPHIA

ANGLERS PRO SHOP, INC.
3361 Bethlehem Pike
Souderton, PA 18964
AND
JOANNE NOTARANGELO
3361 Bethlehem Pike
Souderton, PA 18964

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

DOCKET NUMBER:

No. _____

v.

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA
One Tower Square
Hartford, CT 06183

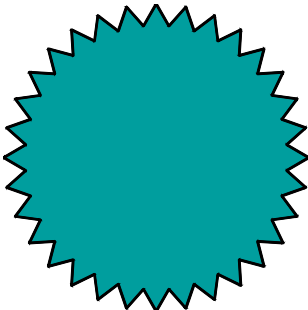
TO: TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA

You are notified that the Plaintiffs: Anglers Pro Shop, Inc. and Joanne Notarangelo

Usted esta avisado que el demandante

Has (have) commenced an action against you.

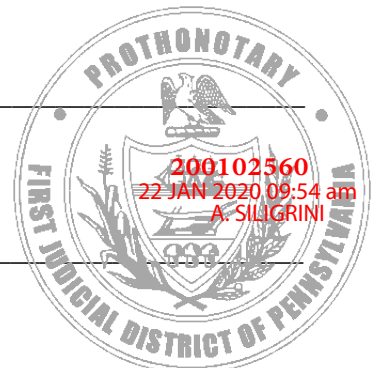
Ha (han) iniciado una accion en contra suya.



ERIC FEDER
Prothonotary

By: _____

Date: _____



Case ID: 200102560

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**

Docket No.: _____

ANGLERS PRO SHOP, INC.
3361 Bethlehem Pike
Souderton, PA 18964
AND
JOANNE NOTARANGELO
3361 Bethlehem Pike
Souderton, PA 18964

v.

TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA
One Tower Square
Hartford, CT 06183

SUMMONS

BY: Joseph A. Zenstein, Esquire
ZENSTEIN KOVALSKY BUCKALEW, LLC
Two Logan Square
100 N. 18th Street, Suite 300
Philadelphia, PA 19103
215-230-0800

EXHIBIT "2"

ZENSTEIN KOVALSKY BUCKALEW, LLC

By: JOSEPH A. ZENSTEIN, ESQUIRE

Identification No.: 62349

1240 Old York Road, Suite 101

Warminster, PA 18974

jzenstein@zenteinlaw.com

215-230-0800

MAJOR CASE

Filed and Attested by the
Office of Judicial Records
04 FEB 2020 11:56 am
G. IMPERATO

Attorney for Plaintiffs

ANGLERS PRO SHOP, INC

And

JOANNE NOTARANGELO

v.

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

JANUARY TERM, 2020

NO. 2560

**AFFIDAVIT OF SERVICE BY MAIL
PROOF OF SERVICE**

I, Joseph A. Zenstein, Esquire, being duly sworn according to law, depose and state that I mailed by Certified Mail, Return Receipt Requested, a true and correct copy of the Civil Action Writ of Summons filed in the above-captioned matter to Defendant, Travelers Casualty Insurance Company of America, One Tower Square, Hartford, CT 06183.

A true and correct copy of Plaintiffs' counsel's letter to Defendant enclosing the Writ along with the Return Receipt signed by Defendant's agent, evidencing delivery on January 27, 2020, is attached hereto as Exhibit "A".

ZENSTEIN KOVALSKY BUCKALEW, LLC



BY: _____

JOSEPH A. ZENSTEIN, ESQUIRE
Attorney for Plaintiffs

Date: February 4, 2020



ZENSTEIN KOVALSKY BUCKALEW, LLC

ATTORNEYS AT LAW

A Pennsylvania Limited Liability Company

Phone: 833.3.STORMS
www.zensteinlaw.com

FILE NO.: 512-2547

January 22, 2020

VIA CERTIFIED MAIL

Travelers Casualty Insurance of America
One Tower Square
Hartford, CT 06183

Re: Anglers Pro Shop, Inc., et al. v. Travelers Casualty Company Insurance
Company of America
Philadelphia Court of Common Pleas/ Docket No: 200102560

Dear Sir/Madam:

Enclosed please find Civil Action Writ of Summons which has been filed against you in the above-referenced matter. I would advise you to forward this document to your attorney immediately. If you would like to discuss an amicable resolution of this matter, please do not hesitate to contact me.

Thank you for your attention to this matter.

Very truly yours,

JOSEPH A. ZENSTEIN, ESQUIRE
jzenstein@zensteinlaw.com

JAZ/MJ
Enclosure
Certified Mail
Return Receipt # 7019 0700 0002 2415 0963

7019 0700 0002 2415 0963

U.S. Postal Service TM CERTIFIED MAIL [®] RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com	
OFFICIAL USE	
Certified Mail Fee	\$
Extra Services & Fees (check box and fee as appropriate)	\$
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$
Total Postage and Fees	\$
Sent To	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4 [®]	
Postmark Here	
PS Form 3800, April 2015 PSN 7530-02-000-9017 See Reverse for Instructions	

ZENSTEIN KOVALSKY BUCKALEW, LLC | Attorneys
Main Office / Mailing Address: 1240 Old York Road, Suite 101 |
Phone: 215.230.0800 | Fax: 215.230.0810
Philadelphia Office: Two Logan Square | 100 N. 18th Street, Suite 301

Case ID: 200102560

Exhibit “A”

512-2547

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p style="font-size: 1.2em;">Travelers Casualty Insurance Company of America One Tower Square Hartford, CT 06183</p> <p style="text-align: center;">9590 9402 4885 9032 5852 18</p> <p>2. Article Number (Transfer from service label)</p> <p style="font-size: 1.2em;">7019 0700 0002 2415 0963</p> <p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>A. Signature</p> <p>X</p> <p>B. Received by (Printed Name)</p> <p>Adrian Mazzoni</p> <p>C. Date of Delivery</p> <p>JAN 27 2020</p> <p>D. Is delivery address different from item 1? If YES, enter delivery address below:</p> <p>Yes</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input checked="" type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery over \$500</p>		<p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Return Receipt for Merchandise</p> <p><input checked="" type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	

Domestic Return Receipt

EXHIBIT "3"

ZENSTEIN KOVALSKY BUCKALEW, LLC

By: JOSEPH A. ZENSTEIN, ESQUIRE

Identification No.: 62349

Two Logan Square

100 N. 18th Street, Suite 300

Philadelphia, PA 19103

izenstein@zensteinlaw.com

(215) 230-0800

MAJOR CASE

Filed and Attested by the
Office of Judicial Records
12 MAR 2020 11:40 am
M. RUSSO



Attorney for Plaintiffs

ANGLERS PRO SHOP, INC.

3361 Bethlehem Pike

Souderton, PA 18964

and

JOANNE NOTARANGELO

3361 Bethlehem Pike

Souderton, PA 18964

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

DOCKET NUMBER: 200102560

v.

TRAVELERS CASUALTY INSURANCE

COMPANY OF AMERICA

One Tower Square

Hartford, CT 06183

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you.

You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the Plaintiffs. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association Lawyer Referral
and Information Service
One Reading Center Philadelphia, Pennsylvania 19107 (215)
238-6333
TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados De Filadelfia
Servicio De Referencia E Informacion Legal
One Reading Center Filadelfia, Pennsylvania (215) 238-
6333/TTY (215) 451-6197

ZENSTEIN KOVALSKY BUCKALEW, LLC

By: JOSEPH A. ZENSTEIN, ESQUIRE

MAJOR CASE

Identification No.: 62349

Two Logan Square

100 N. 18th Street, Suite 300

Philadelphia, PA 19103

izenstein@zensteinlaw.com

(215) 230-0800

Attorney for Plaintiffs

ANGLERS PRO SHOP, INC.

3361 Bethlehem Pike

Souderton, PA 18964

and

JOANNE NOTARANGELO

3361 Bethlehem Pike

Souderton, PA 18964

v.

TRAVELERS CASUALTY INSURANCE

COMPANY OF AMERICA

One Tower Square

Hartford, CT 06183

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

DOCKET NUMBER: 200102560

CIVIL ACTION COMPLAINT

(1C. Contracts)

1. Plaintiffs, ANGLERS PRO SHOP, INC. is a business entity with its place of business at the address as set forth above.

2. JOANNE NOTARANGELO is and adult individual residing at the address as set forth above.

3. Defendant, TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA, is a corporation duly organized and existing which is licensed to issue policies of insurance in the Commonwealth of Pennsylvania and maintains its principal place of business at the address set forth above. Defendant regularly conducts business in the

City and County of Philadelphia.

4. Defendant in its regular course of business issued to Plaintiffs a policy of insurance, policy number 680-75234878-17-42 covering Plaintiffs' premises located at 3361 Bethlehem Pike, Souderton, PA 18964. Plaintiffs is not in possession of the entire policy and it is alleged that said policy is in the possession of Defendant.

5. At all times material hereto, Defendant was acting either individually or through its duly authorized agents, servants, workmen or employees, who were acting within the course and scope of their employment and on the business of said employer.

6. On or about April 16, 2018, while said policy of insurance was in full force and effect, Plaintiffs suffered a sudden and accidental direct physical loss to the insured premises, resulting in damage to the insured premises in those areas and to the extent set forth in the estimate of Alliance Adjustment Group, a true and correct copy of which is attached hereto, made part hereof, and marked Exhibit "A".

7. Notice of Plaintiffs' covered loss was given to Defendant in a prompt and timely manner and Plaintiffs have done and otherwise performed all things required of them under the policy of insurance issued by Defendant, including cooperating with Defendant's investigation; mitigating damages where reasonable, required and/or possible; providing Defendant with all available information and complying with all conditions precedent.

8. Defendant determined that Plaintiffs suffered a loss to property that was covered under the terms and conditions of the policy but failed and refused to indemnify Plaintiffs completely for the loss.

9. To the extent that Defendant failed and refused to fully indemnify Plaintiffs

completely for the loss, Defendant denied coverage for certain aspects of the claim in whole or in part.

10. Defendant, despite demand for benefits under its policy of insurance has failed and refused to pay to Plaintiffs those benefits due and owing under said policy of insurance.

11. Defendant has breached its contractual obligations to pay benefits to Plaintiffs for a loss covered under Defendant's policy of insurance.

12. Solely as a result of Defendant's failure and refusal to pay benefits to Plaintiffs as required under the aforementioned policy of insurance, Plaintiffs have suffered loss and damage in an amount in excess of \$50,000.00.

WHEREFORE, Plaintiffs demand judgment against Defendant in an amount in excess of \$50,000.00 together with interest and costs.

ZENSTEIN KOVALSKY BUCKALEW, LLC



BY: _____

JOSEPH A. ZENSTEIN, ESQUIRE
Attorney for Plaintiffs

Date: March 12, 2020

VERIFICATION

I verify that I have read the foregoing Complaint and that it is true and correct to the best of my knowledge, information and belief. I make this Verification subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

X) Anglers Pro Shop, Inc.
ANGLERS PRO SHOP INC.
X) Joanne E. Notarangelo
JOANNE E. NOTARANGELO

FILE NO.: 512-2547

EXHIBIT "A"

Alliance Adjustment Group, Inc.435 N. Main Street,
Doylestown PA 18901ANGLERS PRO SHOP, INC.
3361 BETHLEHEM PIKE
SOUDERTON PA 18964Date of Est.: 7/10/18
Estimator: JAMES WAGNER, C
File Number: C18.1268
Date of Loss: 5/ 1/18
Type of Loss: STORM DAMAGE

Description	Repairs
01 Demolition	\$2,492.10
02 Lumber and Millwork	\$39,100.96
04 Roofing	\$22,590.72
08 Insulation	\$534.16
09 Dry Wall	\$1,890.00
13 Hardwood Flooring	\$20,490.79
14 Carpeting	\$11,943.36
15 Painting / Wallpapering	\$1,952.88
16 Electrical	\$7,046.80
19 Glazing & Windows	\$429.30
23 Siding & Cappings	\$21,491.63
28 Miscellaneous & Hardware	\$574.67
29 Specialties & Special Construction	\$66,146.16
80 Waterproofing	\$2,556.00
98 Deodorizing	\$219.78
99 Building Cleaning	\$841.84



Sub Total:	\$200,301.15
Overhead : 10%	\$20,030.12
SubTotal:	\$220,331.27
Profit: 10%	\$22,033.13
SubTotal:	\$242,364.39
Ins Tax Permits: 3%	\$7,270.93
Total:	\$249,635.32

* - not included in Overhead, Profit, and Ins Tax Permits calculations.



This estimate is based upon representations made directly to Alliance Adjustment Group by the insured(s) or the insured(s) representative as to the location and date of origin of physical damage to the subject property. Further, this estimate, at the time of its preparation, represents the opinion of Alliance Adjustment Group as to the scope and cost of repairs to restore the property to its pre-loss condition, to the extent possible. This estimate contains the replacement cost value of the loss and, unless noted, does not consider or specify the presence or absence of pre-existing damage such as wear and tear, prior loss, or any other adverse condition in those areas included in our estimate. While it is possible that such adverse conditions existed at the time of our inspection, Alliance Adjustment Group considers this an issue of depreciation to be addressed with the insurer. Alliance Adjustment Group reserves the right to revise this estimate at any time upon receipt or discovery of new or additional information. The estimate may be based on preliminary review and subject to corrections, revisions, additions and deletions. The estimate may be compiled by the use of computer or other electronically generated means. Any errors or omissions, either by virtue of misprint or by incorrect entries by a data processor, should be considered a typographical error. We attempt to proof read all estimate entries, however the information contained in the estimate has not been subject to scrupulous auditing and review.

Case ID: 200102560

ANGLERS PRO SHOP, INC. 3361 BETHLEHEM PIKE SOUDERTON, PA 18964

7/10/18
C18.1268

DEMO & MISC. (0' 0" X 0' 0" X 0' 0")
 Offset 1 (0' 0" X 0' 0" X 0' 0")
 Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 0 Wall Sf: 0 Ceiling SF: 0 Total SF: 0

Description	Quantity	Price	Total	#
Mildew Treatment	2	\$195.75 ea	\$391.50	99
Deodorizing (Per Level)	2	\$109.89 ea	\$219.78	98
Demo Carpenters Labor Per Day	4	\$302.40 ea	\$1,209.60	01
Demo Laborer Per Day	3	\$202.50 ea	\$607.50	01
Dumpster 20 C.Y. Capacity	1	\$675.00 ea	\$675.00	01
Electrical Service Line to Sign (as per Mike Giradi Electric proposal)	1	\$5,900.00 ls	\$5,900.00	16
Asphalt Paving (as per Schmidt Paving LLC)	1	\$31,750.00 ls	\$31,750.00	29
Note: The above paving work is required based on the access required to install the new electrical service cable to the sign.	1	\$0.00	\$0.00	01
Remove & Replace Vinyl Siding on the Right and Left Side Gables (as per Rossetti Carpetry LLC proposal)	1	\$19,525.00 ls	\$19,525.00	23
Total Room Price:			\$60,278.38	

SIGN (0' 0" X 0' 0" X 0' 0")
 Offset 1 (0' 0" X 0' 0" X 0' 0")
 Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 0 Wall Sf: 0 Ceiling SF: 0 Total SF: 0

Description	Quantity	Price	Total	#
Sign (Open)	1	\$7,500.00 ls	\$7,500.00	29
Total Room Price:			\$7,500.00	

ROOF (60' 0" X 30' 0" X 1' 0")
 Offset 1 (60' 0" X 30' 0" X 1' 0")
 Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 360 Wall Sf: 360 Ceiling SF: 3600 Total SF: 3960

Description	Quantity	Price	Total	#
Roofing Removal	3600	\$0.89 sf	\$3,204.00	04
Asphalt Felt Paper	3600	\$0.71 sf	\$2,556.00	80
Asphalt Shingles 320 lb	3600	\$3.68 sf	\$13,248.00	04
Attic Vent	2	\$109.35 ea	\$218.70	23
Roof Edge Cap	291	\$2.60 lf	\$756.60	04
Ice & Water Shield (Rolled)	550	\$2.34 sf	\$1,287.00	04
Vent Collars	2	\$89.24 ea	\$178.48	04



This estimate is based upon representations made directly to Alliance Adjustment Group by the insured(s) or the insured(s) representative as to the location and date of origin of physical damage to the subject property. Further, this estimate, at the time of its preparation, represents the opinion of Alliance Adjustment Group as to the scope and cost of repairs to restore the property to its pre-loss condition, to the extent possible. This estimate contains the replacement cost value of the loss and, unless noted, does not consider or specify the presence or absence of pre-existing damage such as wear and tear, prior loss, or any other adverse condition in those areas included in our estimate. While it is possible that such adverse conditions existed at the time of our inspection, Alliance Adjustment Group considers this an issue of depreciation to be addressed with the insurer. Alliance Adjustment Group reserves the right to revise this estimate at any time upon receipt or discovery of new or additional information. The estimate may be based on preliminary review and is subject to corrections, revisions, additions and deletions. The estimate may be compiled by the use of computer or other electronically generated means. Any errors or omissions, either by virtue of misprint or by incorrect entries by a data processor, should be considered a typographical error. We attempt to proof read all estimate entries, however the information contained in the estimate has not been subject to scrupulous auditing and review.

ANGLERS PRO SHOP, INC. 3361 BETHLEHEM PIKE SOUDERTON, PA 18964

7/10/18

C18.1268

Step Flashing	46	\$8.84 lf	\$406.64	04
Steep Roof Charge	3600	\$0.71 sf	\$2,556.00	04
High Roof Charge	1800	\$0.53 sf	\$954.00	04
Total Room Price:			\$25,365.42	

LEFT ELEVATION (0' 0" X 0' 0" X 0' 0")
 Offset 1 (0' 0" X 0' 0" X 0' 0")
 Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 0 Wall Sf: 0 Ceiling SF: 0 Total SF: 0

Description	Quantity	Price	Total	#
R & R Air Conditioner Window	2	\$98.83 ea	\$197.66	16
Aluminum Capping (Avg Window	2	\$52.19 ea	\$104.38	23
Aluminum Capping (Large Window)	5	\$86.81 ea	\$434.05	23
Aluminum Capping (Average Door)	1	\$69.62 ea	\$69.62	23
Aluminum Fascia Capping to 8"	82	\$3.35 lf	\$274.70	23
Total Room Price:			\$1,080.41	

RIGHT ELEVATION (44' 0" X 26' 0" X 1' 0")
 Offset 1 (0' 0" X 0' 0" X 0' 0")
 Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 140 Wall Sf: 140 Ceiling SF: 1144 Total SF: 1284

Description	Quantity	Price	Total	#
Aluminum Capping (Large Window)	6	\$86.81 ea	\$520.86	23
Aluminum Capping (Average Door)	1	\$69.62 ea	\$69.62	23
Aluminum Fascia Capping to 8"	82	\$3.35 lf	\$274.70	23
Total Room Price:			\$865.18	

2ND FLOOR LEFT KITCHEN (15' 4" X 13' 10" X 6' 9")
 Offset 1 (6' 11" X 5' 8" X 6' 9")
 Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 84 Wall Sf: 564 Ceiling SF: 251 Total SF: 815

Description	Quantity	Price	Total	#
Post Construction Cleaning (SF)	251	\$0.23 sf	\$57.73	99
Remove Subflooring	32	\$1.01 sf	\$32.32	02
3/4" Plywood Subflooring	32	\$2.77 sf	\$88.64	02
Seal Walls	564	\$0.39 sf	\$219.96	15
Paint Walls	564	\$0.55 sf	\$310.20	15
6/6 Window Unit	1	\$429.30 ea	\$429.30	19



This estimate is based upon representations made directly to Alliance Adjustment Group by the insured(s) or the insured(s) representative as to the location and date of origin of physical damage to the subject property. Further, this estimate, at the time of its preparation, represents the opinion of Alliance Adjustment Group as to the scope and cost of repairs to restore the property to its pre-loss condition, to the extent possible. This estimate contains the replacement cost value of the loss and, unless noted, does not consider or specify the presence or absence of pre-existing damage such as wear and tear, prior loss, or any other adverse condition in those areas included in our estimate. While it is possible that such adverse conditions existed at the time of our inspection, Alliance Adjustment Group considers this an issue of depreciation to be addressed with the insurer. Alliance Adjustment Group reserves the right to revise this estimate at any time upon receipt or discovery of new or additional information. The estimate may be based on preliminary review and subject to corrections, revisions, additions and deletions. The estimate may be compiled by the use of computer or other electronically generated means. Any errors or omissions, either by virtue of misprint or by incorrect entries by a data processor, should be considered a typographical error. We attempt to proof read all estimate entries. However, the information contained in the estimate has not been subject to scrupulous auditing and review.

ANGLERS PRO SHOP, INC.

3361 BETHLEHEM PIKE SOUDERTON, PA 18964

7/10/18

C18.1268

Carpet Tear Out	22	\$3.68 sy	\$80.96	14
Carpet Installation	22	\$4.84 sy	\$106.48	14
Carpet Padding (Good Grade)	22	\$4.60 sy	\$101.20	14
Carpet Residential (Good Grade)	24	\$36.78 sy	\$882.72	14
R/Reset Contents & Protect	2	\$37.53 ea	\$75.06	28
Remove & Reset Heater Vent	2	\$8.10 ea	\$16.20	28
R & R Air Conditioner Window	1	\$98.83 ea	\$98.83	16
Remove & Reset Refrigerator	1	\$33.05 ea	\$33.05	28

Total Room Price: \$2,532.65

2ND FLOOR RIGHT ROOM

(15' 4" X 9' 8" X 7' 0")

Offset 1

(0' 0" X 0' 0" X 0' 0")

Offset 2

(0' 0" X 0' 0" X 0' 0")

Linear Feet: 50

Wall Sf: 350

Ceiling SF: 148

Total SF: 498

Description	Quantity	Price	Total	#
Remove Wood Flooring	41	\$2.79 sf	\$114.39	13
Prefinish Oak Flooring	41	\$16.68 sf	\$683.88	13
Drywall Repair (Standard)	1	\$472.50 ea	\$472.50	09
Insulation (Standard)	1	\$133.54 ea	\$133.54	08
Molding Quarter Round 3/4" Oak	19	\$2.71 lf	\$51.49	02
Molding Window Set Ranch	1	\$43.74 st	\$43.74	02
Remove Subflooring	32	\$1.01 sf	\$32.32	02
3/4" Plywood Subflooring	32	\$2.77 sf	\$88.64	02
Seal Walls	175	\$0.39 sf	\$68.25	15
Seal Ceiling	148	\$0.39 sf	\$57.72	15
Paint Walls	175	\$0.55 sf	\$96.25	15
Paint Ceiling	148	\$0.55 sf	\$81.40	15
Stain Window Trim	2	\$67.42 ea	\$134.84	15
Stain Shoe	19	\$2.52 lf	\$47.88	15
Carpet Tear Out	15	\$3.68 sy	\$55.20	14
Carpet Installation	15	\$4.84 sy	\$72.60	14
Carpet Padding (Good Grade)	15	\$4.60 sy	\$69.00	14
Carpet Residential (Good Grade)	13	\$36.78 sy	\$478.14	14
R/Reset Electric Base Heater	1	\$30.79 ea	\$30.79	16
Total Room Price:			\$2,812.57	



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ANGLERS PRO SHOP, INC. 3361 BETHLEHEM PIKE SOUDERTON, PA 18964

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RIGHT MIDDLE ROOM (15' 4" X 13' 0" X 8' 0")
Offset 1 (5' 5" X 7' 4" X 8' 0")
Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 82 Wall Sf: 657 Ceiling SF: 239 Total SF: 896

Description	Quantity	Price	Total	#
Carpet Tear Out	20	\$3.68 sy	\$73.60	14
Carpet Installation	20	\$4.84 sy	\$96.80	14
Carpet Padding (Good Grade)	20	\$4.60 sy	\$92.00	14
Carpet Residential (Good Grade)	22	\$36.78 sy	\$809.16	14
Total Room Price:			\$1,071.56	

MAIN SHOWROOM (33' 8" X 19' 9" X 14' 0")
Offset 1 (38' 10" X 12' 5" X 14' 0")
Offset 2 (20' 11" X 20' 10" X 14' 0")

Linear Feet: 293 Wall Sf: 4100 Ceiling SF: 1583 Total SF: 5683

Description	Quantity	Price	Total	#
Post Construction Cleaning (SF)	1583	\$0.23 sf	\$364.09	99
Remove Wood Flooring	1583	\$2.79 sf	\$4,416.57	13
Pergo/Laminate Flooring	1583	\$9.65 sf	\$15,275.95	13
Drywall Repair (Standard)	1	\$472.50 ea	\$472.50	09
Insulation (Standard)	1	\$133.54 ea	\$133.54	08
Seal Walls & Ceiling	283	\$0.39 sf	\$110.37	15
Paint Walls & Ceiling	283	\$0.55 sf	\$155.65	15
Paint Doors Oneside	1	\$22.52 un	\$22.52	15
Paint Door Trim & Jamb 1 side	1	\$18.98 un	\$18.98	15
Remove Paneling (SF)	1108	\$1.17 sf	\$1,296.36	02
Paneling Good Grade Wood	1108	\$3.30 sf	\$3,656.40	02
Carpet Tear Out	176	\$3.68 sy	\$647.68	14
Carpet Installation	176	\$4.84 sy	\$851.84	14
Carpet Commercial (28 OZ)	198	\$38.01 sy	\$7,525.98	14
Remove & Reset Light Fixture	19	\$33.43 ea	\$635.17	16
Remove Reclaimed T&G Ceiling	788	\$3.09 sf	\$2,434.92	02
Reclaimed T&G Ceiling 3/4"	788	\$14.80 sf	\$11,662.40	02
Remove & Reset Retail Store Inventory, Racks, & Displays	1583	\$15.52 sf	\$24,568.16	29
Wall Track Display Panels (Wood)	1326	\$6.61 sf	\$8,764.86	02
Note: Leak at Right Gable Near Ceiling, Plus at Right Lower Window. Also at Back Door and at Right of Entrance Door	1	\$0.00	\$0.00	01
Note: The Laminate Flooring is installed directly ovetop of carpeting. It will be necessary to access the Laminate Flooring in order to access	1	\$0.00	\$0.00	01

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ANGLERS PRO SHOP, INC. 3361 BETHLEHEM PIKE SOUDERTON, PA 18964

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and effectuate the removal of the affected caroeing and substrate below.

Total Room Price: \$83,013.94

REAR LEFT SHOWROOM (13' 4" X 11' 3" X 14' 0")
Offset 1 (0' 0" X 0' 0" X 0' 0")
Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 49 Wall Sf: 688 Ceiling SF: 150 Total SF: 838

Description	Quantity	Price	Total	#
Remove Reclaimed T&G Ceiling	339	\$3.09 SF	\$1,047.51	02
Reclaimed T&G Ceiling 3/4"	339	\$14.80 sf	\$5,017.20	02
Wall Track Display Panels (Wood)	264	\$6.61 sf	\$1,745.04	02
Remove & Reset Retail Store Inventory, Racks, & Displays	150	\$15.52 sf	\$2,328.00	29
Note: Floors and wall panels are continuous from Main Showroom	1	\$0.00	\$0.00	01
Total Room Price:			\$10,137.75	

LEFT OFFICE (15' 9" X 9' 2" X 7' 0")
Offset 1 (16' 10" X 5' 7" X 7' 0")
Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 95 Wall Sf: 663 Ceiling SF: 238 Total SF: 901

Description	Quantity	Price	Total	#
Drywall Repair (Standard)	1	\$472.50 ea	\$472.50	09
Insulation (Standard)	1	\$133.54 ea	\$133.54	08
Seal Walls	492	\$0.39 sf	\$191.88	15
Seal Ceiling	177	\$0.39 sf	\$69.03	15
Paint Walls	492	\$0.55 sf	\$270.60	15
Paint Ceiling	177	\$0.55 sf	\$97.35	15
Remove Paneling (SF)	127	\$1.17 sf	\$148.59	02
Bead Board Paneling	127	\$3.90 sf	\$495.30	02
R/Reset Contents & Protect	6	\$37.53 ea	\$225.18	28
Remove & Reset Light Fixture	3	\$33.43 ea	\$100.29	16
Remove & Reset Alarm Fixture	1	\$50.63 ea	\$50.63	16
Note: Leak down through ceiling and wall at the gable end directly below the dislocated window in the 2nd Floor Kitchen Room above.	1	\$0.00	\$0.00	01
Total Room Price:			\$2,254.89	

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LEFT LOFT AREA (21' 0" X 5' 11" X 6' 4")
Offset 1 (0' 0" X 0' 0" X 0' 0")
Offset 2 (0' 0" X 0' 0" X 0' 0")

Linear Feet: 54 Wall Sf: 341 Ceiling SF: 124 Total SF: 465

Description	Quantity	Price	Total	#
Post Construction Cleaning (SF)	124	\$0.23 sf	\$28.52	99
Drywall Repair (Standard)	1	\$472.50 ea	\$472.50	09
Insulation (Standard)	1	\$133.54 ea	\$133.54	08
Remove Paneling (SF)	170	\$1.17 sf	\$198.90	02
Paneling Good Grade Wood	170	\$3.30 sf	\$561.00	02
R/Reset Contents & Protect	6	\$37.53 ea	\$225.18	28
Remove & Reset Light Fixture	1	\$33.43 ea	\$33.43	16
Remove Reclaimed T&G Ceiling	97	\$3.09 sf	\$299.73	02
Reclaimed T&G Ceiling 3/4"	97	\$14.80 sf	\$1,435.60	02
Note: Leak at Ceiling Above Window. Damage to Ceiling and Wall Paneling	1	\$0.00	\$0.00	01
Total Room Price:			\$3,388.40	

Total Estimate Price: \$200,301.15



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EXHIBIT "4"

BUTLER WEIHMULLER KATZ CRAIG LLP

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*Attorneys for Defendant,
Travelers Casualty Insurance Company
of America*

ANGLERS PRO SHOP, INC.
and
JOANNE NOTARANGELO

Plaintiffs,

v.

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA

Defendant.

: IN THE COURT OF COMMON PLEAS
: OF PHILADELPHIA COUNTY

:
: CIVIL ACTION

:
: Case No.: 200102560

DEFENDANT'S NOTICE OF FILING OF NOTICE OF REMOVAL

TO THE PROTHONOTARY:

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 1332, 1441 and 1446, Defendant, Travelers Casualty Insurance Company of America, has filed in this matter a Notice of Removal with the Clerk of the United States District Court for the Eastern District of Pennsylvania. See Notice of Removal filed in the Eastern District of Pennsylvania, without its enclosures, attached hereto as Exhibit "A".

BUTLER WEIHMULLER KATZ CRAIG LLP

s/ Michael J. McLaughlin

MICHAEL J. McLAUGHLIN, ESQ.

*Attorneys for Defendant, Travelers Casualty
Insurance Company of America*

Dated: April 2, 2020

CERTIFICATE OF SERVICE

I, Michael J. McLaughlin, hereby certify that, on this 2nd day of April, 2020, a true and correct copy of the foregoing Notice of Filing of Notice of Removal has been served via electronic mail on the following counsel of record:

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jzenstein@zensteinlaw.com
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Attorneys for Plaintiff

BUTLER WEIHMULLER KATZ CRAIG LLP

s/ Michael J. McLaughlin

MICHAEL J. McLAUGHLIN, ESQ.
*Attorney for Defendant, Travelers Casualty
Insurance Company of America*